Remarks

Applicants thank the Examiner for his careful consideration of this application. Reconsideration of this application is now respectfully requested in view of the amendments above and the following remarks.

In the specification, paragraph [4] has been amended to update the information about co-pending applications referenced. Paragraphs [31] and [76] have been amended to correct minor editorial problems noted in the Office Action at Pages 2-3.

Figures 4 and 6 have been amended to correct misspellings (both of the word "parameters"), only one of which (the latter) was noted in the objection to the drawings at Page 2 of the Office Action.

Claims 1-29 remain pending in the application, with Claims 1, 27, and 29 being the independent claims. Claims 1, 14, 27, and 29 have been amended.

Claim 14 has been amended to correct the misspelling objected to at Page 3 of the Office Action.

At Pages 3-4, the Office Action rejects Claims 1, 2, 22, 25-27, and 29 under 35 U.S.C. § 102(e) as being anticipated by Maeda (U.S. Patent No. 6,625,316). At Pages 4-5, the Office Action rejects Claims 3-5 and 23 under 35 U.S.C. § 103(a) as being unpatentable over Maeda in view of Jasinschi et al. (U.S. Patent No. 6,504,569). At Pages 5-6, the Office Action rejects Claims 6, 13, and 15 under 35 U.S.C. § 103(a) as being unpatentable over Maeda in view of

Foreman et al. (U.S. Patent No. 6,504,569). At Pages 6-8, the Office Action rejects Claims 7-12, 14, 16-21, 24, and 28 under 35 U.S.C. § 103(a) as being unpatentable over Maeda in view of Petelycky et al. (U.S. Patent No. 6,204,840). Applicants respectfully traverse these rejections for the following reasons.

Claim 1 has been amended to specify that "at least one modified camera-motion layer corresponds to an original camera-motion layer containing at least one substantially non-stationary component." Similar amendments have been made to Claims 27 and 29. Consequently, the claimed invention is able to address non-stationary camera layers having objects in motion or in which the camera is in motion, thus causing significant apparent motion of objects in the background.

The Office Action cites Maeda at col. 13, lines 15-28 as disclosing the editing of at least one or more camera-motion layers. As discussed in the Office Action (at Page 4), this portion of Maeda discloses modifying the background portion of the input. However, the background being manipulated in the cited portion of Maeda is **substantially stationary**, not "substantially non-stationary." This is apparent from the discussion in Maeda at col. 2, lines 32-42, where it is discussed that background, as referred to in Maeda, has "no (or little) motion." Col. 2, line 38.

For at least these reasons, Claims 1, 27, and 29, as well as Claims 2-26 and 28, which depend from these claims, are allowable over the cited prior art.

There are additional reasons for which various dependent claims are respectfully submitted to be allowable over the cited prior art:

- Regarding Claims 6 and 15, the Office Action at Page 5 cites Foreman et al., noting Fig. 8 and col. 9, lines 61-62 as teaching the addition of a video sequence to one of the original camera-motion layers (to obtain a modified camera-motion layer. However, it is noted that this portion of Foreman et al., noting col. 9, lines 51 ff., is **not** describing adding a video sequence to a (pre-existing) camera-motion layer of a video sequence. Rather, it is describing a video editing system that allows a user to put together segments of a video inputs to form a video program. **Foreman et al., therefore, is not directed to the modification of camera-motion layers.**
- Regarding Claim 13, again, Foreman et al., noting Figure 8 and col. 9, lines 61-67, is cited as teaching the changing of ordering of camera-motion layers as claimed. However, this portion of Foreman et al. is **not** directed to ordering of camera-motion layers of a video sequence; rather, **this portion of Foreman et al. is directed to the ordering of video segments. Therefore, Foreman et al. does not deal with ordering camera-motion layers.**
- Regarding Claims 7-12, 14, 16-21, 24, and 28, Petelycky et al. is used to teach various features having to do with manipulating camera-motion layers. However, Applicants note that Petelycky et al. is directed to a "non-timeline, non-linear digital composition system," noting, for example, col. 2, line 56. As discussed at col. 1, line 39 to col. 2, line 2, a timeline-based composition system or editor is one in which a multimedia composition is broken down into multiple layers. Therefore, Petelycky et al. teaches away from the use of layer-based systems. **Consequently, the features of Petelycky**

et al. can not be combined with those of layer-based systems of any kind to show manipulations of particular layers.

- Regarding Claim 9, the Office Action cites "Official Notice" for it being known to add a user-activated region to a camera-motion layer of video. Applicants request that a reference be cited to show that this is known.
- Regarding Claim 10, the Office Action cites Petelycky et al., Fig. 3B, specifically, the use of the sliders shown, as modifying the on/off time of a camera-motion layer, as claimed. However, noting col. 13, lines 50 ff., the sliders in Fig. 3B are used to turn on and off a special effect being added to a video, **not to turn on and off a camera-motion layer.**
- Regarding Claims 11 and 16, the Office Action cites Petelycky et al., Fig. 3E, specifically the "transparent slider" and the "size slider," as teaching the modification of the opaqueness or the size of a camera-motion layer. However, noting col. 14, line 66 to col. 15, line 28, Fig. 3E is directed to the addition of animation to a video. Therefore, the "transparent slider" addresses the transparency of the animation, and the "size slider" addresses the size of the animation, **not the transparency or size of a camera-motion layer.**
- Regarding Claim 12, the Office Action cites Petelycky et al., Fig. 3F, ref. numerals 364 and 365, as teaching the fading in/out of a camera-motion layer. However, as discussed at col. 15, lines 29-61, Fig. 3F is directed to an **audio editor** and has nothing to do with fading in/out of anything having to do with video.

- Regarding Claim 14, the Office Action cites Petelycky et al. at col. 11, lines 53-54, as teaching addition or deletion of a camera-motion layer. However, this passages does not teach this; rather, it teaches adding or removing source materials from a "storyline" (which, as discussed in cols. 9-10, is what is used to assemble and manipulate various digital objects into a composition). It involves no layers, as discussed above.
- Regarding Claims 17-20 and 24, the Office Action cites Maeda at col. 13, lines 15-25 and col. 14, lines 38-44, as citing the various claim elements, which relate to editing camera motion parameters. In particular, the Office Action at Page 7 asserts that the affine transformation capability disclosed in Maeda (at col. 13, lines 20-21) teaches editing camera motion parameters. Applicants respectfully disagree. Camera motion may be described by an affine transformation; however, the mere ability to apply an affine transformation to an image is **not the same** as editing camera motion parameters, although it may enable one to do so.

These claims are, therefore, allowable over the cited prior art for these further reasons.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants, therefore, respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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Amendments to the Drawings:

The two attached sheets of drawings include changes to Figs. 4 and 6. These two sheets include, respectively, Figs. 4 and 6, and replace the corresponding two original sheets of drawings. In Fig. 4, Block 42 and in Fig. 6, Block 76, a spelling error has been corrected.

Attachments: Two Replacement Sheets
Two Annotated Sheets Showing Changes

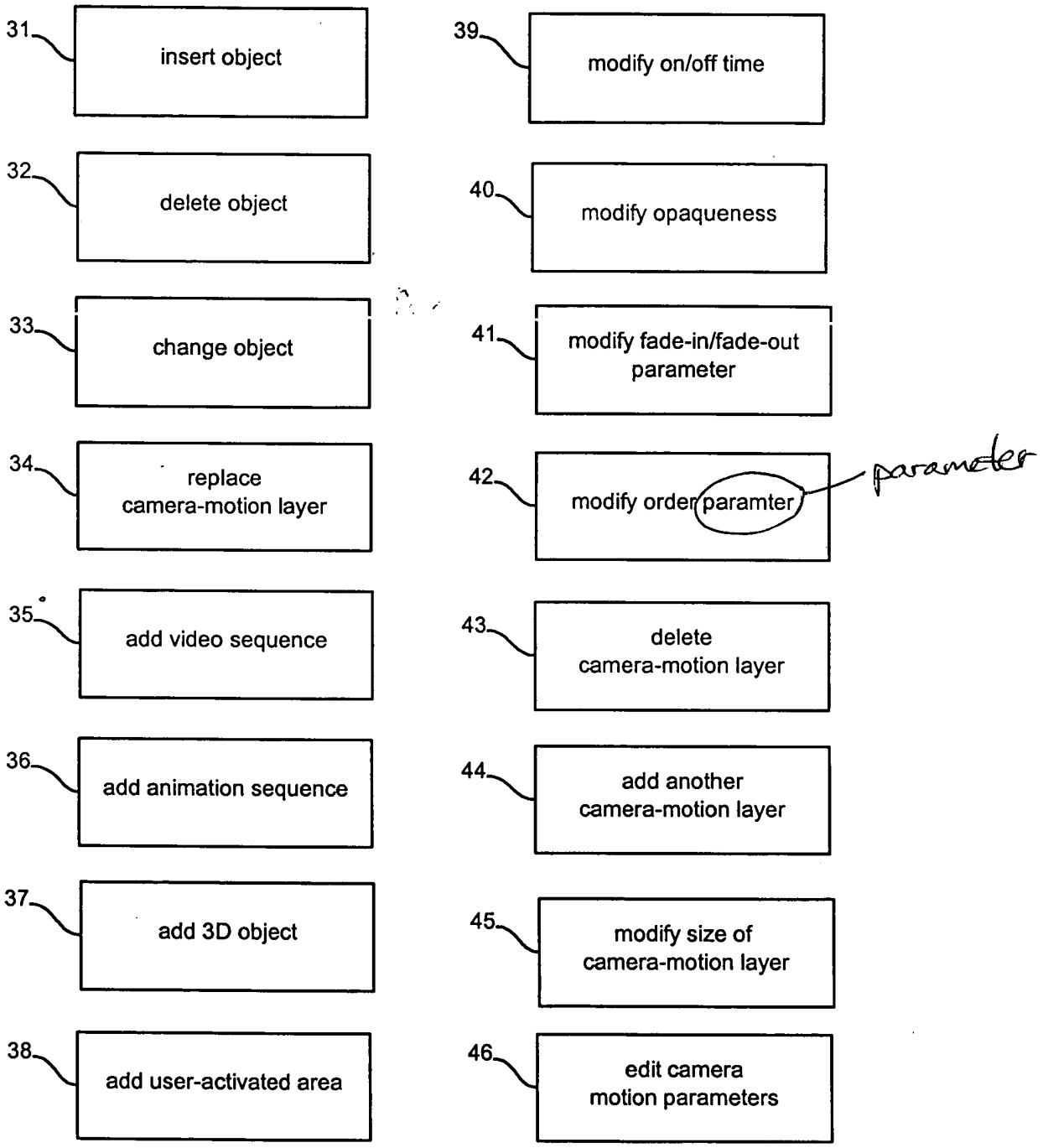

FIG. 4

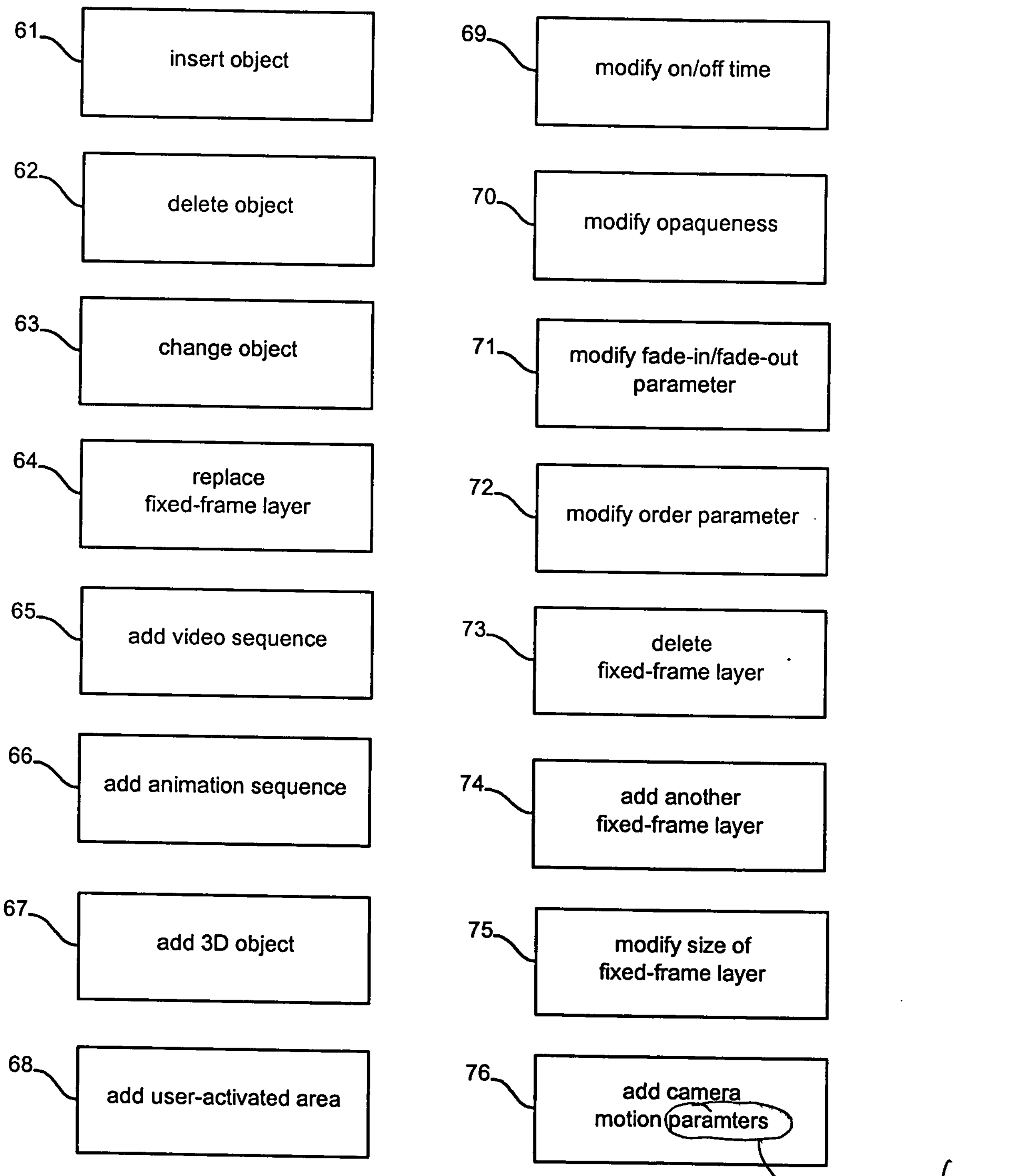

FIG. 6